

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

---

Crystal Long	*	
	*	
Plaintiff,	*	Case No.: 8:17-cv-01955-GJH
	*	
	*	
	*	
v.	*	
	*	
	*	
Ability Recovery Services, LLC, et al.	*	
	*	
Defendants.	*	
	*	

---

**DEFENDANT, ABILITY RECOVERY SERVICES, LLC'S MOTION FOR  
SUMMARY JUDGMENT AND OPPOSITION TO PLAINTIFF'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

NOW COMES Defendant, Ability Recovery Services, LLC, by and through its undersigned counsel, and pursuant to Federal Rule of Civil Procedure 56 moves this Honorable Court for an Order granting summary judgment in its favor and against Plaintiff, Crystal Long as to all Counts in Plaintiff's Amended Complaint and opposes Plaintiff's Motion for Partial Summary Judgment. Defendant also seeks an Order from the Court limiting Plaintiff's damages to statutory damages for her claims pursuant to the Fair Debt Collections Practices Act, 15 U.S.C. § 1692, *et seq.*, the Maryland Consumer Debt Collection Act, Md. Code Ann., Com. Law §§ 14-201, *et seq.* and the Maryland Consumer Protection Act, Md. Code Ann., Com. Law §§ 13-301, *et seq.*

A Memorandum of Law with a Statement of Undisputed Facts supporting Defendant's Motion for Summary Judgment and opposing Plaintiff's Motion for Partial Summary Judgment is attached hereto.

Respectfully submitted,

**STRADLEY RONON STEVENS &  
YOUNG**

By: /s/ Thomas F. Lucchesi  
Thomas F. Lucchesi, Esquire  
1250 Connecticut Ave, NW, Suite 500  
Washington, DC 20036  
(202) 507-6401/(202) 822 0140 (fax)  
tlucchesi@stradley.com  
Attorneys for Defendant  
Ability Recovery Services, LLC

**MARGOLIS EDELSTEIN**

By: /s/ Ronald M. Metcho  
RONALD M. METCHO  
220 Penn Avenue, Suite 305  
Scranton, PA 18503  
(570) 220-2091  
rmetcho@margolisedelstein.com  
Attorneys for Defendant  
Ability Recovery Services, LLC

**CERTIFICATE OF SERVICE**

I, Thomas F. Lucchesi, hereby certify that the foregoing Motion, accompanying brief and exhibits were filed electronically through the Court's ECF system and were served electronically through the Court's ECF system upon all counsel of record.

/s/ Thomas F. Lucchesi

Thomas F. Lucchesi